

UNITED STATES DISTRICT COURT  
DISTRICT OF ALABAMA NORTHERN DIVISION

RECEIVED

2007 MAR 28 AM 9:49

WILLIAM P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Robert Lee ALLEN,  
Plaintiffs,  
V.

Case NO. 2:07-CV-85-WKW  
Case NO. 2:07-CV-90-ID-WO

SHERIFF WILLIE VAUGHNER, et al.,  
Defendants.

Motion For Discovery of UNDISCLOSED INFORMATION  
AN MOTION FOR ISSUANCE OF SubPOENA

COMES NOW, PLAINTIFF, Robert Lee ALLEN, PROSE,  
AND RESPECTFULLY MOVES this HONORABLE COURT  
FOR AN ORDER that A SubPOENA be ISSUED  
Addressed to the Lowndes County SHERIFF Department  
Willie VAUGHNER, Located At 653 STATE HWY 21  
South, Hayneville, AL, 36040-6033, COMMANDING  
them to Provide PLAINTIFF A Copy of ALL VIDEO  
tapes FROM the Lowndes County DETENTION Facility,  
Video SURVAILANCE, FOR these Dates January 16, 2007,  
January 21, 2007, January 22, 2007, January 29, 2007, January 30,  
2007, AND February 7, 2007. (FOR the whole Jail INSIDE)  
AND that All tapes be dated AND label FOR these dates  
From 6:00 AM to 6:00 PM for each date listed,

And Produce Radio transmission From Car to dispatch,  
And dispatch Audio tapes And dispatch log sheets  
Any AND All IN Full For this the day of February 7, 2007  
From the hours of 6:00 AM to 6:00 PM From the  
Lowndes County SHERIFF Department PLAINTIFF's  
Want a Copy of Video surveillance tapes OF LOWNDES  
County Detention Facility "SALLY PORT" outside  
Videos ON February 7, 2007, From 6:00 AM to 12:00 PM

THE Above name evidence (AND the list below)  
And said Materials are Vital to Plaintiff's defense  
of this cause. The PLAINTIFF's Cannot Safely go  
To A jury Trial without the Above AND below  
evidence And Materials, And the Plaintiff does Not  
have sufficient Means and is Actually UNable to  
pay the Fees Required to have said Subpoenas  
issued as is More fully Shown IN the PLAINTIFF's  
Affidavit that was submitted with said Complaints  
filed 1-31-2007 AND 02-02-2007,  
PLAINTIFF, Prays that this Honorable Court will  
let Him proceed and obtain the ReQuESted  
listEd Materials to prove, And Defend the Alleged  
Violation OF His Constitutional Rights that's  
Due to him by Law, PLAINTIFF, states Cause AN  
Reason in the following:

1.) I want All ORIGINAL Computer printout Copies of the Lowndes County Detention Facility, INmate Jail Bed Roster For these dates of the following MONTHS, August 2<sup>ND</sup> thru 19<sup>th</sup>, 2006, August AND January 15<sup>th</sup>, 2007, thru February 15<sup>th</sup>, 2007, AND A updated Current INmate Bed Roster Sheet to be mailed to plaintiff within the next 18 days so that Plaintiff can correctly spell witnesses names to send their Interrogatories to them when Plaintiff files his motion with the courts these documents are vital to this cause, and case.

2.) I want the Names And Addresses of ALL Employee's of the Lowndes County Detention Facility, that worked there from August 1<sup>st</sup>, 2006 to February 28<sup>th</sup>, 2007 For Interrogatories purpose's, And to make sure Plaintiff does not misspell or misquote any more names, And for other legal matters that pertain to this cause And case.

3.) I want Copies of All plaintiff's Disciplinary Original

- 4.) I want a list of All employees that worked the dates that plaintiff's ReQuESted Jail Survaliance tapes in Full.
- 5.) I want AN ORDER to produce whatever the Judge rule is permissable in this Motion AND would Allow for good cause And what IS NOT to Be DISReGard.
- 6.) THE Defendant's will in NO way be prejudiced by these ReQuESt

RESPECTFully Submitted.

CERTIFICATE OF SERVICE

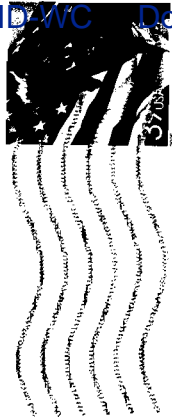
I PROSE, Robert Lee ALLEN Sending A Copy OF the Foregoing MOTION to Defendants Attorney DARYL L MASTERS, by MAILing a Copy OF the SAME IN the UNITED STATES MAIL properly ADDRESSED And with Sufficient postage prepaid, this the 27<sup>th</sup> day OF MARCH 2007.

Robert Allen  
Autauga Jail  
136 N. Court Street  
Prattville AL, 36067-3002

prose Robert Allen  
3-27-2007 Robert Allen

Robert Allen  
136 N. Court Street  
Prattville AL 36067-3002

MONTGOMERY AL 361  
28 MAR 2007 PM 3 T



To. MRS. Debra Hackett, Clerk  
P.O. Box 711  
Montgomery AL 36101-0711

36101-0711

